

### **III. REMARKS**

#### **A. Overview**

Claims 1-4, 6-60, 62, 63, 65-71 are pending in the present matter. Claims 5 and 64 are cancelled by present amendment; claim 61 was cancelled by previous amendment. Claims 1, 3, 8, 45, 48, 49, 53, 56, 62, 63, 65, and 67-71 are amended by present amendment. In general, the amendments clarify that the method includes a determination of whether the stored value was “inserted into a customer account with a provider of goods or services,” and further clarifies that the stored value is transferred in its entirety. Applicants respectfully submit that no new matter is included in the instant amendments.

#### **B. Rejection of Claims 1-60 and 62-71 Under 35 U.S.C. § 102(e) As Being Allegedly Anticipated By Risafi**

Claims 1-60 and 62-70 were rejected under 35 U.S.C. §102(e) as being allegedly anticipated by U.S. Patent No. 6,473,500 to Risafi *et al* (“Risafi”).

As discussed in the previous Response, the present invention is directed at a means of verifying that the product at issue is in an acceptable state for a return transaction. The product at issue is a PIN-enabled stored value account, that may be used to insert value into a customer’s pre-existing account with a provider of goods or services. In order to determine if a return transaction is authorized, a determination must be made as to whether the PIN-enabled stored value account still contains the initial value, or if the value has already been transferred into a customer’s provider account. If the value has already been transferred, the return transaction may be denied, while if the value has not been transferred into a customer’s provider account, the return transaction may be authorized.

1. Risafi Does Not Disclose, Teach, or Suggest the Method of Claim 1

*a. Claim 1*

As amended, claim 1 recites, *inter alia*, a method of conducting a return transaction that includes a PIN “operative to insert the associated value into a customer account with a provider of goods or services.” Additionally, the method includes the step of “determining whether the associated value has been inserted into the customer account.”

*b. Risafi*

Risafi generally describes a prepaid card that works similarly to a debit card, but without the need to have a pre-existing account with a bank. Risafi describes being able to use the card in a similar fashion to a debit card, i.e., purchase goods at retail locations and withdraw funds from ATMs. Risafi discloses a process of closing a card account, wherein a customer presents the stored value card, and the stored value card number, the card’s PIN, and a transaction code are provided to a processor. The processor verifies that the information entered matches stored records, and determines how much value is in the account. The value remaining in the account is then provided to the customer as a refund, and the balance of the account is set to zero, essentially closing the stored value account. *See* Risafi, col. 15, lines 13-41.

*c. Risafi Does Not Disclose, Teach, or Suggest Claim 1*

Risafi does not disclose, teach, or suggest claim 1 of the present invention. Nothing in Risafi discloses a return transaction for a PIN-enabled stored value account that is “operative to insert the associated value into a customer account with a provider of goods and services.” In addition, nothing in Risafi discloses, suggests, or teaches the step of “determining whether the associated value has been inserted into the customer account.”

What Risafi does disclose is an inquiry to determine (i) if information provided by the customer matches information stored in a record; and (ii) what the value remaining in the stored value account is in order to provide a refund of the remaining value. The present invention is intrinsically different than the process disclosed in Risafi. The present invention does not inquire as to the particular balance remaining in the associated account, but instead inquires if the value, as a whole, has been transferred. Additionally, the product at issue is inherently different. While Risafi is directed to a prepaid card that works similarly to a debit card, without the need to have a pre-existing account with a bank, the present invention is directed to a PIN-enabled stored value account wherein the PIN is operative to insert the associated value into a customer account with a provider of goods or services. Because of the differences in products, the methods of determining if the products have remaining value is different.

Accordingly, Applicants respectfully submit that Risafi does not disclose, teach, or suggest the claim elements of claim 1 and the Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. 102(e) be withdrawn.

2. Risafi Does Not Disclose, Teach, or Suggest  
The Methods of Claims 2-4 and 6-44

The Applicants submit that claims 2-4 and 6-44 are dependent on claim 1, which has been shown to be patentable over the cited reference. The Applicants therefore submit that claims 2-4 and 6-44 must also be patentable over Risafi and therefore respectfully request that the rejection of claims 2-4 and 6-44 under 35 U.S.C. 102(e) be withdrawn.

3. Risafi Does Not Disclose, Teach, or Suggest the Method of Claim 45

a. ***Claim 45***

As amended, claim 45 recites, *inter alia*, a method of conducting a return transaction that includes a PIN “operative to insert the associated value into a customer account with a provider of goods or services.” Additionally, the method includes the step of “determining whether the associated value has been inserted into the customer account.”

b. ***Risafi***

As discussed above, Risafi generally describes a prepaid card and a process of closing a card account, wherein a customer presents the stored value card, and the stored value card number, the card’s PIN, and a transaction code are provided to a processor. The processor verifies that the information entered matches stored records, and determines how much value is in the account. The value remaining in the account is then provided to the customer as a refund, and the balance of the account is set to zero, essentially closing the stored value account. *See* Risafi, col. 15, lines 13-41.

c. ***Risafi Does Not Disclose, Teach, or Suggest Claim 45***

Risafi does not disclose, teach, or suggest claim 45 of the present invention. Nothing in Risafi discloses a return transaction for a PIN-enabled stored value account that is “operative to insert the associated value into a customer account with a provider of goods and services.” In addition, nothing in Risafi discloses, suggests, or teaches the step of “determining whether the associated value has been inserted into the customer account.”

Risafi discloses a method of closing a stored value account, which determines (i) if information provided by the customer matches information stored in a record; and (ii) what the value remaining in the stored value account is in order to provide a refund of the remaining value. The present invention, however, does not inquire as to the particular balance remaining in the associated account, but instead inquires if the value, as a whole, has been transferred. Risafi does not disclose a method including the step of “determining whether the associated value has been inserted into a customer account.”

Additionally, the product the method surrounds in the present application is different than the that of Risafi. Risafi is directed to a prepaid card that works similarly to a debit card, without the need to have a pre-existing account with a bank, while the present invention is directed to a PIN-enabled stored value account wherein the PIN is operative to insert the associated value into a customer account with a provider of goods or services. Because of the differences in products, the methods of determining if the products have remaining value is different.

Accordingly, Applicants respectfully submit that Risafi does not disclose, teach, or suggest the claim elements of claim 45 and the Applicants respectfully request that the rejection of claim 45 under 35 U.S.C. 102(e) be withdrawn.

4. Risafi Does Not Disclose, Teach, or Suggest the Methods of Claims 46-55

The Applicants submit that claims 46-55 are dependent on claim 45, which has been shown to be patentable over the cited reference. The Applicants therefore submit that claims 46-55 must also be patentable over Risafi and therefore respectfully request that the rejection of claims 46-55 under 35 U.S.C. 102(e) be withdrawn.

5. Risafi Does Not Disclose, Teach, or Suggest the Method of Claim 56

*a. Claim 56*

Similar to claims 1 and 45, claim 56 as amended recites, *inter alia*, a method of conducting a return transaction that includes a PIN “operative to insert the associated value into a customer account with a provider of goods or services.” Additionally, the method includes the step of “determining whether the associated value has been inserted into the customer account.”

*b. Risafi*

As discussed above, Risafi is directed to a prepaid card and a process of closing a card account, wherein a customer presents the stored value card and the stored value card number, the card’s PIN, and a transaction code are provided to a processor. The processor verifies that the information entered matches stored records, and determines how much value is in the account. The value remaining in the account is then provided to the customer as a refund, and the balance of the account is set to zero, essentially closing the stored value account. *See* Risafi, col. 15, lines 13-41.

*c. Risafi Does Not Disclose, Teach, or Suggest Claim 56*

Risafi does not disclose, teach, or suggest claim 56 of the present invention. Nothing in Risafi discloses a return transaction for a PIN-enabled stored value account that is “operative to insert the associated value into a customer account with a provider of goods and services.” In addition, nothing in Risafi discloses, suggests, or teaches the step of “determining whether the associated value has been inserted into the customer account.”

Risafi includes disclosure directed at the closing of a stored value account. In closing a stored value account, Risafi determines (i) if information provided by the customer matches information stored in a record; and (ii) what the value remaining in the stored value account is in order to provide a refund of the remaining value. The present invention, however, does not inquire as to the particular balance remaining in the associated account, but instead inquires if the value, as a whole, has been transferred. Risafi does not disclose a method including the step of “determining whether the associated value has been inserted into a customer account.”

The PIN-enabled stored value account that the method claimed in claim 56 surrounds is different than the stored-value debit card disclosed in Risafi. Because of the differences in products, the methods of determining if the products have remaining value is different. In the present application, the method treats the stored value in its entirety--noting that it has already been inserted into a customer account or has not. In contrast, Risafi determines what the residual or remaining value in the stored value account is, and provides a refund of the same amount.

Applicants respectfully submit that Risafi does not disclose, teach, or suggest the claim elements of claim 56 and the Applicants respectfully request that the rejection of claim 56 under 35 U.S.C. 102(e) be withdrawn.

6. Risafi Does Not Disclose, Teach, or Suggest  
The Methods of Claims 57-60, 62, 63, 65-67

The Applicants submit that claims 57-60, 62, 63, and 65-67 are dependent on claim 56, which has been shown to be patentable over the cited reference. The Applicants therefore submit that claims 57-60, 62, 63, and 65-67 must also be patentable over Risafi and therefore

respectfully request that the rejection of claims 57-60, 62, 63, and 65-67 under 35 U.S.C. 102(e) be withdrawn.

7. Risafi Does Not Disclose, Teach, or Suggest the Method of Claims 68-71

*a. Claims 68-71*

Claims 68, 69, and 71 recites a method of conducting a stored value account return transaction. Claim 70 recites a computer-readable medium encoded with computer program code to conduct a stored value account return transaction. Each claim recites a return request, comprising *inter alia* a PIN, wherein the PIN is “operative to insert the associated value into a customer account with a provider of goods or services.” Additionally, each claim recites the step of determining “whether the associated value has been inserted into the customer account.”

*b. Risafi*

As discussed above, Risafi is directed to a prepaid card and a process of closing a card account, wherein a customer presents the stored value card and the stored value card number, the card’s PIN, and a transaction code are provided to a processor. The processor verifies that the information entered matches stored records, and determines how much value is in the account. The value remaining in the account is then provided to the customer as a refund, and the balance of the account is set to zero, essentially closing the stored value account. *See* Risafi, col. 15, lines 13-41.

*c. Risafi Does Not Disclose, Teach, or Suggest Claims 68-71*

Risafi does not disclose, teach, or suggest claims 68-71 of the present invention. Nothing in Risafi discloses a return transaction for a PIN-enabled stored value account that is “operative



to insert the associated value into a customer account with a provider of goods and services.” In addition, nothing in Risafi discloses, suggests, or teaches the step of “determining whether the associated value has been inserted into the customer account.”

Risafi includes disclosure directed at the closing of a stored value account. In closing a stored value account, Risafi determines (i) if information provided by the customer matches information stored in a record; and (ii) what the value remaining in the stored value account is in order to provide a refund of the remaining value. The present invention, however, does not inquire as to the particular balance remaining in the associated account, but instead inquires if the value, as a whole, has been transferred. Risafi does not disclose a method including the step of “determining whether the associated value has been inserted into a customer account.”

The PIN-enabled stored value account that the method claimed in claim 68-71 surrounds is different than the stored-value debit card disclosed in Risafi. Because of the differences in products, the methods of determining if the products have remaining value is different. In the present application, the method treats the stored value in its entirety--noting that it has already been inserted into a customer account or has not. In contrast, Risafi determines what the residual or remaining value in the stored value account is, and provides a refund of the same amount.

Applicants respectfully submit that Risafi does not disclose, teach, or suggest the claim elements of claim 68-71 and the Applicants respectfully request that the rejection of claim 68-71 under 35 U.S.C. 102(e) be withdrawn.

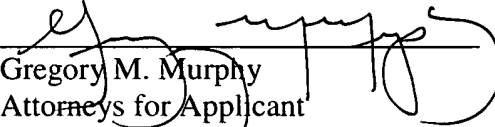
**V. Conclusion**

For all the reasons set forth above, it is respectfully submitted that all outstanding rejections have been overcome. All pending claims are patentably distinguishable over the prior art of record. Applicants accordingly submit that these claims are in a condition for allowance. Reconsideration and allowance of all claims are respectfully requested.

Should the Office have any questions or wish to discuss the present application, please contact the undersigned representative of Applicants at the number listed below.

Respectfully submitted,

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